

Exhibit A

Defendants Planned Parenthood Gulf Coast (“PPGC”), Planned Parenthood of Greater Texas, Inc., (“PPGT”), Planned Parenthood South Texas, Inc., (“PP South Texas”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (collectively, the “Texas Affiliates”); and Planned Parenthood Federation of America, Inc. (“PPFA”), (together, the “Defendants”) hereby submit their Initial Disclosures to Relator Doe and the State of Texas (“Plaintiffs”) pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

These disclosures are made based on the information presently available to Defendants and are subject to supplementation or modification as more information becomes available. By making these disclosures, Defendants are not representing that they are identifying every document, tangible thing, or witness possibly relevant to this lawsuit. These disclosures are not intended to prejudice or waive any privileges or objections any of the Defendants may have with respect to any outstanding or subsequent requests for discovery.¹

I. RULE 26(a)(1)(A)(i) WITNESSES

Defendants hereby disclose this list of persons who Defendants believe are likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment, based on Defendants’ knowledge to date.

¹ Defendants understand that discovery will not begin until after the Court issues a Scheduling Order. Order (March 7, 2022) (finding that Defendants’ outstanding motion to dismiss constitutes “good cause” for delay and stating that the “Court anticipates it will rule on the pending Motions to Dismiss (ECF Nos. 44, 47, 48, 50) before it issues a Scheduling Order that includes Rule 34 production and other relevant discovery deadlines”).

Name	Contact Information	Subject Matter
Melaney Linton PPGC President & Chief Executive Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's Texas and Louisiana Medicaid termination, Texas & Louisiana Medicaid claims process, and research agreements.
Melissa Farrell Former PPGC Research Director	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's research agreements.
Alfred Curtis PPGC Chief Operating Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's Texas and Louisiana Medicaid termination, Texas & Louisiana Medicaid claims process, and research agreements.
Ronda Exnicious Clinical Health Network for Transformation, Chief Revenue Officer Former PPGC Vice President, Revenue Cycle Management	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGC's Texas and Louisiana Medicaid termination and Texas and Louisiana Medicaid claims process, including during the period covered by the injunction of the termination notice.
Jeffrey Hons PP South Texas President & Chief Executive Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PP South Texas' Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.
Polin Barraza PP South Texas Senior Vice President & Chief Operating Officer PP Cameron County President PP San Antonio President	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PP South Texas, PP Cameron County, and PP San Antonio's Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.

Name	Contact Information	Subject Matter
Ken Lambrecht PPGT President & Chief Executive Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.
Sheila McKinney PPGT Chief Operating Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.
Dan Sannes PPGT Chief Financial Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.
Kasia White PPGT Vice President Quality, Risk Management & Training	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.
Beth Watson PPGT Vice President Health Services	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPGT's Texas Medicaid termination, Texas Medicaid claims process, including during the period covered by the injunction of the termination notice, and research agreements.

Name	Contact Information	Subject Matter
Kim Custer PPFA Executive Vice President & Chief Federation Engagement & Impact Officer	This witness should be contacted through undersigned counsel.	May have knowledge of facts related to PPFA's relationship with its member-affiliates.
Relator Alex Doe		
Unknown individuals currently or formerly employed by the Center for Medicare and Medicaid Services ("CMS")	Unknown	May have knowledge of facts related to the administration of the federal Medicaid program.
Unknown individuals currently or formerly employed by the Texas Ranger Division of the Texas Department of Public Safety	Unknown	May have knowledge of facts related to a visit by the Texas Rangers to PPGC to discuss research contracts.
Unknown individuals currently or formerly employed by the Texas Health & Human Services	Unknown	May have knowledge of facts related to Texas Affiliates' eligibility to participate and participation in Texas Medicaid.
Unknown individuals currently or formerly employed by the Texas HHSC Office of Inspector General	Unknown	May have knowledge of facts related to the decision to terminate the Texas Affiliates from Texas Medicaid.
Senator Chuck Grassley Former Chair of Senate Judiciary Committee	Unknown	May have knowledge of facts related to Relator's contact with the committee and other Members of Congress.
Senator Marsha Blackburn Chair of 2015 House Select Panel of the Energy & Commerce committee	Unknown	May have knowledge of facts related to Relator's contact with the committee and other Members of Congress.

Name	Contact Information	Subject Matter
All Designated Fed. R. Civ. P. 30(b)(6) Witnesses	To be determined	Topics for which witnesses are or have been designated.

Defendants also reserve the right to call any witness identified in Plaintiffs' complaints, any witnesses that Defendants identify in response to Plaintiffs' discovery requests, and any witness that Plaintiffs identify as persons with relevant knowledge.

II. RULE 26(a)(1)(A)(ii) DOCUMENTS AND TANGIBLE THINGS

Pursuant to Rule 26(a)(1)(A)(ii), Defendants identify the following categories of documents, electronically stored information, and tangible things that Defendants have in their possession that they may use to support their defenses presented in this case:

1. Communications between Plaintiffs and Defendants;
 2. Communications between Relator and Texas Affiliates, their employees, and/or their staff members;
 3. Materials from Texas Affiliates regarding site visits by Relator or other "investigators" to any of the Texas Affiliates;
 4. Communications related to Texas Affiliates' Texas Medicaid claims after receiving termination notices;
 5. Communications related to Texas Affiliates' Louisiana Medicaid claims after receiving termination notices;
 6. Documents related to Texas Affiliates' Texas Medicaid claims submissions;
 7. Documents related to Texas Affiliates' Louisiana Medicaid claims submissions;
 8. Documents regarding Texas Affiliates' eligibility to participate in Texas Medicaid;
- and

9. Documents regarding Texas Affiliates' eligibility to participate in Louisiana Medicaid.

III. RULE 26(a)(1)(A)(iii) DAMAGES

Not applicable.

IV. RULE 26(a)(1)(A)(iv) INSURANCE

Not applicable.

V. Supplementation

Defendants' Initial Disclosures are made without prejudice to Defendants' rights to change or supplement their responses, Defendants' rights to assert privileges or objections with respect to any requests for discovery, and Defendants' rights to introduce at trial additional evidence and documents as warranted by the development of the facts underlying this lawsuit.

Dated: March 9, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2022, the foregoing Defendants' Rule 26(a)(1) Initial Disclosures were served upon all counsel of record for Plaintiffs by e-mail.

/s/ Craig D. Margolis

Craig D. Margolis